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Before the

FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)

N11 Codes and Other Abbreviated)
Dialing Arrangements)

CC Docket No. 94-105

IAD File No. 94-101

**COMMENTS OF COX ENTERPRISES, INC.,
ADVANCE PUBLICATIONS, INC., GANNETT CO., INC.,
THE HEARST CORPORATION AND THE WASHINGTON POST COMPANY**

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SUMMARY

The Media Parties, a coalition of companies that provide a significant part of the nation's information infrastructure, urge the Commission to adopt rules that designate N11 numbers to be used for locally-based electronic information services. N11 service represents the best hope for bringing inexpensive and innovative telephone information services to consumers across the country, with all the benefits, economic and otherwise, that will result. No other telephone services can satisfy this need, and there is no other use for N11 numbers better serves the public interest.

The Media Parties, through their extensive experience in providing information services, have determined that they need a telephone service that permits them to provide information services at low cost to the geographic markets they serve. The Media Parties must be able to tailor their services to their markets, to obtain revenue to support the growth and development of their information services and to keep the price of the services to consumers reasonable.

Except for N11 service, there is no telephone service that meets the needs of the Media Parties and other similar information services providers. N11 service is a perfect fit. It is convenient for consumers, permits information services providers to collect modest fees for the services they provide and is considerably less expensive for information services providers than other pay-per-call alternatives.

Where it has been made available, N11 service has proven its value to consumers and information services providers. N11 service generates high call volumes that remain steady or grow, in contrast to other pay-per-call services that show significant drops in call volume over time. Consumers keep calling an N11-based information

service because they like it, as is demonstrated by market research and an infinitesimal complaint rate. The revenues from N11-based information services support the introduction of new and innovative services, including interactive classified advertising, yellow pages and movie services; fax services; and breaking news, as well as significant expansion of existing information service offerings.

The N11-based services in West Palm Beach and Atlanta have produced no ill effects, including no customer confusion between the N11 service and either 411 or 911. Rather, N11 service has been so successful that both Florida and Georgia have expanded it from one-city, one-number trials to statewide availability.

At the same time, there are no other telephone services that can meet the needs of local information services providers as well as N11 can. Existing pay-per-call services, such as 900 and 976 service, are designed for large geographic areas, and cost so much that charges to consumers are too high. These services also have unsavory reputations that make consumers wary. "Free" services, such as 7-digit numbers, do not permit information services providers to recover their costs and alternative dialing arrangements, such as #XXX, are still years away. As a result, N11 service is the only option to bring the benefits of telephone-based information services to consumers today.

Finally, the Commission should reject efforts to set N11 numbers aside for uses that require national coverage. Making any N11 service available on a nationwide basis will take years, is technically infeasible in some areas and will be unreasonably expensive for the uses that are proposed. There already are other resources, notably 800

numbers, which are available on a nationwide basis today and which do not have the drawbacks that make N11 numbers unsuitable for nationwide use.

Thus, the public interest will be served best by designating N11 numbers for localized use by information services providers. The Media Parties submit that this proceeding is likely the Commission's last best chance to secure the benefits of widespread availability of locally-based information services to consumers across the country. For that reason, they urge the Commission to designate N11 numbers to be used for information services in accordance with its original proposal in this proceeding.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	CC Docket No. 92-105
N11 Codes and Other Abbreviated)	
Dialing Arrangements)	IAD File No. 94-101

COMMENTS OF THE MEDIA PARTIES

Cox Enterprises, Inc., Advance Publications, Inc., Gannett Co., Inc., The Hearst Corporation and The Washington Post Company (collectively, the "Media Parties"), by their attorneys, hereby submit their comments in response to the Public Notice in the above-referenced matter.^{1/} The Media Parties welcome the opportunity to present their views to the Commission on the progress of efforts to use N11 service to meet the needs of electronic information services providers. As described in more detail below, the Media Parties submit that the time is ripe for the Commission to make the benefits of N11 service available to information services providers across the country. Commission action is particularly important because most telephone companies remain unwilling to provide N11 service despite the clear success of N11 service in those states where it is offered. Consequently, the Media Parties respectfully request that the Commission act in this proceeding by designating available N11 numbers to be used for locally-based information services.

^{1/} Commission Seeks Comment on Requests of Federal Agencies and Others for the Assignment of N11 Codes, *Public Notice*, IAD File No. 94-101, rel. June 17, 1994 (the "Notice").

I. INTRODUCTION

Collectively, the Media Parties represent a significant part of the nation's information infrastructure. They publish more than 225 newspapers with a combined circulation of more than 13 million. As broadcasters, they are the licensees of radio stations and television stations, including many in large media markets such as Baltimore, Miami, Atlanta and Kansas City. Their other media interests include significant cable television properties and national publications.^{2/}

Over the years, each of the Media Parties has explored how it can provide electronic information services to its customers. All have found a significant gap in the range of telephone offerings they can use to provide information services at low cost to the (generally) local markets they serve. This gap makes it extremely difficult to offer information services in these markets.

N11 service, however, is tailored to meet the needs of the Media Parties and other local information services providers. This service, as it has been defined in this proceeding and in the tariffs filed by BellSouth within its region, consists of four basic elements: (1) abbreviated dialing through an N11 number;^{3/} (2) use of the N11 number to provide access to an information service provider within a limited area; (3)

^{2/} A list of the interests of the Media Parties is attached hereto as Appendix A.

^{3/} As described in the Commission's initial Notice of Proposed Rulemaking in this matter, the "N" in "N11" stands for any number from 2 through 9. Thus, 211 and 611 are N11 numbers and 111 is not. For technical reasons, 011 and 111 are not available for abbreviated dialing. See N11 Codes and Other Abbreviated Dialing Arrangements, *Notice of Proposed Rulemaking*, 7 FCC Rcd 3004 (1992) (the "NPRM").

rating and recording of each call to the N11 number through the telephone company's facilities; and (4) billing and collection provided through local telephone billing.^{4/}

The use of N11 numbers to provide moderate-cost information services was originated by Cox, which requested N11 service for this purpose from BellSouth in Atlanta in August, 1991. BellSouth ultimately agreed to provide the service, subject to obtaining a ruling from the Commission that it was permissible to do so. The Commission's General Counsel issued a letter on May 7, 1992, informing BellSouth that there were "no legal or regulatory impediments" to the offering of N11 service.^{5/} Simultaneously, the Commission initiated this rulemaking proceeding. *See NPRM*. As the *Notice* indicates, since the *NPRM* was issued, the Commission has received several proposals for use of N11 numbers, including one filed by the National Center for Law and Deafness and one filed by the General Services Administration.^{6/}

State regulatory commissions also have been considering N11 service since the issuance of the *NPRM*. Five state commissions have authorized N11 service, and two of those have expanded the service from localized trials to full availability within

4/ The Media Parties also believe that it is important for local exchange carriers to provide efficient access methods for N11 service, including methods that are comparable to those used by the carriers for their own N11 services.

5/ See Letter from Robert L. Pettit, Esq., General Counsel, Federal Communications Commission, to David J. Markey, Vice President-Federal Regulatory, BellSouth Corporation, May 7, 1992.

6/ See *Notice* at 1.

BellSouth territory in their states.^{7/} Many other state commissions have deferred action on tariffs or requests for N11 service pending Commission action in this proceeding.

The Media Parties submit that the experience of the last two years proves both that N11 service is in the public interest and that Commission action is necessary to make this service a reality. In the two years since the *NPRM*, N11 service has been shown to be beneficial to consumers in two separate, extensive trials.^{8/} No other dialing arrangement has emerged as a substitute, and the evidence shows that other proposed uses for N11 numbers would not make efficient use of this numbering resource. Consequently, the Media Parties urge the Commission to adopt rules that mandate the use of certain N11 numbers to be used for locally-based information services.

II. N11 SERVICE IS IN THE PUBLIC INTEREST.

N11 numbers are the best available vehicle to provide localized, low-cost information services to the general public. N11 service can give the public access to new and innovative information offerings over the telephone in an easily accessible format that consumers like. No other service can meet this need.

^{7/} As recently reported, N11 service will be turned up in Miami, Orlando and Fort Lauderdale in the third quarter of this year and in several other cities in BellSouth territory in the fourth quarter. *See Telecommunications Reports*, Aug. 15, 1994 at 14.

^{8/} A report on these trials, which also are discussed further below, is attached as Appendix B.

A. Local Information Services Providers Have Specific Needs.

The interest of information service providers in N11 service is no accident; rather, it is the result of focused efforts to find a service that meets the specific needs of both locally-based information services providers and the public. Over a period of several years, and in many state proceedings, the Media Parties have examined the other available services, but none meets their needs. N11 service, on the other hand, is tailored to the needs of local information services providers and the communities they serve, and the empirical results of N11 offerings in Florida and Georgia demonstrate that N11 service is ideally suited to local information services.

Efforts to find a suitable vehicle for localized information services began well before N11 service was requested by Cox. The Media Parties have been involved in telephone-based information services for years using a variety of mechanisms to provide information services to the public, including regular seven-digit numbers and 700, 800 900 and 976 numbers. Their collective experience includes some of the most extensive information services offerings in the country.

For instance, Cox has operated services based on local seven-digit numbers in Atlanta, Georgia; Austin, Texas; and Dayton, Ohio, and the Atlanta service routinely generated call volumes exceeding 1 million calls a month.^{2/} Gannett has long provided telephone information services to readers of *USA Today*, and its information services operations include personnel with extensive experience with local information services.

^{2/} Cox also has used 900 numbers for some services.

The Washington Post Company has provided services based on local seven (and ten) digit numbers in the Washington, D.C. metropolitan area since February, 1990 at no charge to the public. Its Post-Haste® service currently receives information requests at the rate of 16 million per year. The Hearst Corporation operates, in conjunction with its newspapers, ten audiotext services receiving an average total of 425,000 calls per week. Five of these services are located in Texas, including the *Houston Chronicle's* audiotext service, Dial HOUSTON. Informe, the audiotext service for the *Laredo Morning Times* provides more than 100 categories of information, many in both Spanish and English.^{10/}

The Media Parties have learned several important lessons from their involvement in information services. First, it is difficult to support free services. The costs of those services escalate as they become more popular, but at the same time there are few mechanisms for recovering those costs. Advertising, for instance, is hard to obtain and makes consumers wary of the service. Consumers are frustrated and impatient with advertising in information services, and market research conducted by Cox shows that consumers simply do not trust advertiser-supported services when they are making purchasing decisions, such as deciding where to eat dinner or what movie to see.

^{10/} The Hearst Corporation also operates dial-up telephone information services in conjunction with its radio and television stations, including WBAL-TV and WIYY-FM in Baltimore, Maryland.

Second, existing pay-per-call services do not meet the needs of localized information services providers. Services using 900 and 976 numbers, because they are territorially overinclusive, are expensive, which means that an information services provider must charge high rates simply to recover its costs.^{11/} These higher rates, in turn, drive away consumers. Information services using 900 and 976 numbers also have negative reputations, which makes consumers wary of calling. This is one reason that call volume for 900 services steadily declines.

Thus, experience has shown the Media Parties that there is a gap in the services offered to them by telephone companies. The missing service is a low-priced telephone service that makes local information easily accessible to the public, is tailored to a specific service area and permits information services providers to charge callers a reasonable price for their information. This combination of limited geographic scope, ease of access and low price is essential to the development and expansion of local information offerings, as is discussed below.

^{11/} For instance, in West Palm Beach, the Cox newspaper uses both an N11 number and a 900 number. The charge for any call to the N11 number is 35 cents. Even though the 900 service is priced at Cox's cost for telephone service, the charge to consumers still is 35 cents a minute. Since the average length of calls to the service, through either the N11 numbers or the 900 number, is three minutes, an average 900 call costs three times as much as an average N11 call. Similarly, in Maryland, Bell Atlantic currently charges subscribers to its Audiotex (976/915) service \$1.14 for transport and billing of a 5 minute call. See Bell Atlantic Co.-Maryland, Local Exchange Services Tariff P.S.C.- Md. - No. 202, § 9. C.2.f.

B. N11 Service Is Designed to Meet the Needs of Information Services Providers.

The gap in the range of services available to the Media Parties can be filled by N11 service, a service the telephone companies have long provided for their own use. By dialing 411, for instance, many consumers can get local directory information for a modest price, and the telephone company provides rating and recording and billing and collection through the telephone bill. The service area for N11 numbers is limited by the nature of the numbers and by the design of the public switched telephone network.^{12/} Directory assistance using 411 also is convenient for telephone users because it has an easy-to-remember and easy-to-dial number, which is important to local information services providers.

Experience in Georgia and Florida shows that consumers like N11 service. The N11-based information service offerings in West Palm Beach and Atlanta have attracted well over 1,300,000 calls since they began, and have resulted in very few requests for refunds or complaints. In fact, the overall refund rate, despite generous refund policies in both markets, is less than 8/100 of one percent. This demonstrates an

^{12/} For instance, it is impossible to reach Southern Virginia directory assistance from Washington, D.C. by dialing 1-804-411, and in most cases it also is not possible to obtain long distance numbers from a caller's local 411-based directory assistance. Similarly, dialing 911 connects the caller to local emergency services and, where they are used, 611 connects the caller to local telephone company repair services and 811 connects the caller to the local telephone company business office.

extraordinary level of customer satisfaction. Not surprisingly, market research shows that callers greatly prefer N11-based services to 900-based services.^{13/}

N11 service also meets the other needs of information services providers. The abbreviated dialing provided by N11 numbers makes it easier for the public to use and remember N11-based services. N11 service is a pay-per-call service, so that information services providers can recover the costs of their services from users; but callers are not surprised because they are familiar with charges for 411 directory assistance in most states. N11 service is inexpensive enough to permit a modest charge to callers, as shown by the offerings across BellSouth's region.^{14/}

In addition, N11 service gives companies in small communities a previously unavailable way to provide information services. In both Georgia and Tennessee, the Public Service Commissions have granted requests for N11 service from rural newspapers which intend to use it to bring local information services to their readers. N11 service permits these newspapers to target their actual audiences, rather than forcing them to make services available to a statewide or nationwide population that will not be

^{13/} Attached as Appendix B is a report on the success of N11 numbers in West Palm Beach and Atlanta. It is noteworthy that the greatest number of complaints in the Atlanta service offering have been from consumers who cannot reach the service, either because of restrictions in their PBXs or because they live outside the N11 service area. Moreover, most of the refunds in Atlanta have resulted from one-time problems, such as an information category that was not updated on a particular day. Appendix B at 12.

^{14/} BellSouth's tariffs charge the subscriber 10 cents for the first five minutes of any call to an N11 number, and 2 cents for each subsequent minute. As shown below, this is much lower than the charge for 900 and 976 services. See also note 10, *supra*.

interested. The localized nature of N11 service also results in costs that are tied closely to the size and population of the area served by the information services provider. This means that the costs of obtaining service in rural areas are significantly less than in urban areas, which is not the case for 900, 976 and other services. The National Newspaper Association, which represents smaller newspapers, has endorsed N11 service as the best available means to permit small newspapers to offer information services to their communities.

Thus, N11 service is tailored to the needs of local information services providers in a way that no other service can match. For that reason alone, it is plain that the use of N11 service for access to low cost, limited area information services is in the public interest.

C. Use of N11 Numbers for Information Services Has Been Enormously Successful.

The real test of any service is how it fares in the marketplace. By any standard, N11 service, as it has been made available in Florida and Georgia, passes that test. After more than 17 months of service in West Palm Beach and 11 months of service in Atlanta, there can be no question that N11 service generates unprecedented call volumes and results in exceedingly high customer satisfaction. Highlights of the experience in both states are discussed below.^{15/}

^{15/} Appendix B contains more detailed information on the success of these trials, including call volumes and comparisons between N11 service and 900-based services made available simultaneously in both communities.

Cox has participated in extensive trials of N11 service in Florida and Georgia.^{16/} In these trials, service was made available in West Palm Beach, Florida beginning in March, 1993 and in Atlanta, Georgia beginning in September, 1993.

Cox's experience with N11 service in both Georgia and Florida has been uniformly positive. To date, there have been more than 1,300,000 calls to the two numbers. Call volume has been high, with average call volumes of 18,000 per month in West Palm Beach and 86,000 per month in Atlanta. *See* Appendix B at 11. In comparison, parallel services using 900 numbers, which are priced at the cost of obtaining the 900 transport service, have seen steadily declining call volumes that average less than seven percent of the volume of the N11 services. *Id.* at 14. Moreover, the complaint rate in each N11 market consistently has been below 8/100 of one percent, an extraordinarily low rate for a pay-per-call service. In contrast to 900 service, call volumes for the two N11-based services are steady or increasing and have not experienced any precipitous declines. In fact, the Atlanta service reached its highest volume, more than 106,000 calls, in July, 1994. *Id.* at 11.

Cox's market research shows that consumers like N11-based services much more than 900-based services. They trust the information provided through N11 service more than the information provided through 900 numbers and they greatly prefer the pricing structure of N11-based services. *Id.* at 15. At the same time, there is no

^{16/} In addition, the state commissions in Tennessee, Alabama and Louisiana have approved service trials. Service began in Tennessee on April 18, 1994.

evidence of confusion from N11 service. Cox has uncovered no indication of customer confusion, either from its market research or from a review of calls to its customer service lines. Further, there is no evidence that either consumers or emergency services providers are complaining to regulators about confusion caused by N11 in either state. *Id.* at 12-13.

The experiences in Florida and Georgia have been so positive that, long before the scheduled completion of either trial, the Public Service Commissions in both states decided to expand the availability of N11 service from the single trial cities to assignment of all available numbers within local calling areas throughout their entire states.^{17/} These decisions were made based on reports from Cox, which was operating the trial services, and on the recommendations of the Public Service Commission staffs in both states to expand the availability of N11 service. The Tennessee Public Service Commission, based on the results in Georgia and Florida, decided to make N11 service available state-wide from the outset.^{18/}

^{17/} See, e.g., Georgia Public Service Commission, Docket No. 4232-U, Second Supplemental Order, released January 26, 1994.

^{18/} The Louisiana Public Utilities Commission also has decided to make N11 service available state-wide from the outset. N11 service in Louisiana is expected to begin in the fourth quarter of 1994.

D. Consumers Will Benefit From N11 and the New and Innovative Services N11 Can Provide.

There are good reasons for consumer acceptance of N11 service.

Consumers recognize a good service when they see one, and the introduction of N11-based offerings has permitted the development of inexpensive and innovative new services tailored to consumer needs. Consumers also will benefit from the new competition that N11 service will create in local information services. Without N11 service, it is unlikely that such competition would develop.

1. N11 Service Allows the Introduction of Innovative New Services.

The most immediate benefit of N11 service is that it greatly expands the range of information services that are available to the general public. With N11 in place, the Media Parties and other information services providers will have the ability to provide services that they cannot afford to provide without it. While some of the Media Parties have announced their intention to continue to provide consumers with free access to current information services whenever possible (and several already operate such services), newspapers and other information services providers cannot afford to expand their services or introduce innovative new services without the financial support that can come from N11 service. Moreover, only a low cost service like N11 will permit information services providers to make their own charges low enough to attract consumer interest.

The essential problem for information services providers like the Media Parties is balancing consumer desires and their ability to meet them. Currently, some newspapers offer services that are free to the caller but which they attempt to support with advertising. Demand for these free services is extremely strong, but it is difficult to support, let alone expand those services. As described above, advertiser support is difficult to obtain, and even when a provider can obtain it, that advertising greatly reduces consumer acceptance. *See Part IIA, supra.* Without any mechanism to generate revenue, information services providers are left with high demand for services that cannot pay their way.

N11 service provides a way out of this dilemma by offering local information services providers a reasonably priced way to generate revenues to support the costs of their services. This not only permits expansion of the services that are offered, but permits the development of innovative new services.

The range of services that N11 will permit the Media Parties to offer is wide. Some examples include:

- **Electronic classified ads:** As an alternative to looking through the newspaper, a caller could specify particular requirements and receive a listing of all of the ads that meet those requirements. The list could be provided over the telephone or faxed to the caller. This service is one of the first new services that was added in Atlanta after Cox obtained an N11 number there.
- **Personalized information portfolios:** Callers could design their own information packages, which they could obtain each time they called. For instance, a caller's portfolio could consist of the prices of three stocks and local news highlights and scores.

- **Innovative information services:** Callers could obtain information about, for example, the effects that new legislative proposals will have on them personally by responding to prompts for information.^{19/}
- **Breaking news information:** Information lines can provide updates on news as it happens, or amplify stories in the newspaper. For instance, excerpts from a speech by the Governor could be provided over the telephone or precinct-by-precinct election results could be made available by fax. In West Palm Beach, Cox used its N11 service to provide ongoing updates on the effects of a railroad accident on local traffic, including preferred alternate routes for commuters. In Atlanta, Cox provided inning-by-inning updates of the 1993 pennant race, including descriptions of key plays.
- **News clipping services:** Callers could ask for recent clippings on topics of interest, which then would be faxed to them. The caller also could set up a standing request for stories on selected topics in the future.
- **Highly localized news:** Today, newspapers do not have the ability to include all of the information that is of interest to their readers. N11 would provide a newspaper with a way to report Little League scores, dates for PTA meetings, church events and other highly localized information that is important to small groups of readers but not of sufficiently widespread interest to get into the newspaper.
- **Specialized information:** Atlanta residents can obtain information on travel, financial planning, stocks and commodities, medical topics and classified ads, among other areas, by fax through Cox's N11 service in Atlanta. Some of this information is not available through the newspaper.

^{19/} The Washington Post Company implemented a trial of this type of service the night that President Clinton presented his economic plan to Congress. Callers dialed The Washington Post Company's audio information service, entered category code 1040, responded to prompts about their tax-filing status and gross income, and were informed as to how much their personal income taxes would be affected by the Clinton plan. The category received over 3,000 calls in the first two days of operation, but was discontinued because of the cost associated with maintaining the service on a "free" information line.

- **Live operator services:** The Atlanta N11 service includes live operator services that allow callers to search the classified ads or yellow pages to find goods or services they need. Cox also has begun providing a movie review service using live operators. The costs of these services to Cox would be prohibitive without the revenues from N11.

These are only examples of the services that might be made available, but they provide an idea of the scope of the services that N11 access will make possible. All of these services will benefit the public by expanding the information that is available to them easily, quickly and at modest cost just by dialing the telephone. The Media Parties' commitment to this kind of service expansion is strong, once they have the necessary telephone access vehicles. In fact, as noted above, Cox already is providing some of these new services through its N11 platforms in Georgia and Florida, and the other Media Parties are seeking or have received N11 numbers in state regulatory proceedings.^{20/}

2. N11 Will Create Competition in Information Services.

While the new services made possible by N11 are significant, N11 service also fulfills the equally important goal of increasing consumer choice in information services. N11 service brings new information services providers to the marketplace because it gives them a way to offer high quality, low cost service to the public. It is no

^{20/} For instance, Gannett has received numbers in Tennessee and Louisiana; Newhouse has received numbers in Alabama and Louisiana, with a request pending in Ohio; Hearst has requested N11 numbers in Maryland and Texas; and the Washington Post Company has requested N11 numbers in Maryland and Virginia.

coincidence that the availability of N11 service in Florida, Georgia and Tennessee has created new competition among information services providers and therefore served to increase the information service choices available to the consumers in those states.

There can be no question that N11 service, where it is available, has reduced the net cost and financial risk of providing information services, spurring the growth of those services and encouraging competition among information services providers. In Atlanta, audio services offered by Cox's *Journal and Constitution* were generating unsustainable losses until N11 service became available; now they have achieved financial stability. More important, there was *no* competition in local telephone information services before N11 service became available, but a second information services provider has begun service in Atlanta using an N11 number, receiving hundreds of thousands of calls in its first two months of operation, and other competitors using N11 service will soon enter the market. In Nashville, there were *no* providers of local information services before N11 service became available; now there are two, with a third scheduled to begin service in the near future. N11 service made local information services possible in Florida, first in West Palm Beach and now in Miami, Fort Lauderdale, Orlando and other cities in that state where Southern Bell has assigned numbers.^{21/} The story is the same across Georgia, Florida and Tennessee: where

^{21/} In Miami, it appears that one of the recipients of an N11 number is likely to provide direct competition for directory assistance, creating competition in an area where no competition has existed for many years. BellSouth recently assigned additional N11 numbers in West Palm Beach, creating new competition in information services in that market.

there once were no low cost, locally focused information services, N11 service is making them possible.

3. N11 Makes Information Available to Everyone.

As the country and the Clinton Administration prepare to move into the coming information age, N11 service can play a vital part in bringing more information to more people quickly and inexpensively. Further, in a country where 90-plus percent of the people have access to a telephone, N11 can be the first step in bringing consumers into the information age.

While much of the new information technology is tied to expensive equipment such as computers and high-quality television sets, N11 service can be made available now and requires no special equipment. For a modest charge, consumers will be able to reach a whole world of information to which they had no previous access just by using their telephone. Especially for persons who either cannot or probably will not develop computer skills in the near future, such as the poor and the elderly, N11 service presents an immediate opportunity to join the information age. Consumers also will benefit from the new competition that N11 service will create in local information services. Without N11 service, it is unlikely that such competition would develop.

In short, N11 presents a low-cost, practical opportunity to make the information age immediately meaningful to millions of American citizens. The Media Parties urge the Commission to take this opportunity to require telephone companies to

provide N11 service, and to make quick, inexpensive, easy access to information available to consumers throughout the country.

E. None of the Problems Feared by Opponents of N11 Service Have Materialized.

In response to the *NPRM*, many telephone company commenters proffered a parade of horrors, detailing a variety of harms they said would materialize from the availability of N11 service. After more than a year's experience in trials in two separate states, it is clear that none of these fears have materialized.

1. N11 Service Does Not Create Customer Confusion.

Customer confusion — one of the chief fears of opponents of N11 service — simply does not occur. Claims that confusion is likely are based on faulty logic which is refuted by decades of telephone company practice. More important, practical experience with N11 service shows that confusion is not a problem.

The argument that there will be confusion comes down to a pair of claims: that consumers can neither tell one telephone number from another nor realize when they've gone from one place to another. Neither of these fears is justified. Decades of experience with regular telephone numbers demonstrate that both of these premises are wrong: consumers can tell one number from another and they do understand that a number in one area does not reach the same party in another area. LECs assume these facts when they take such actions as assigning the same telephone number in adjacent area codes or splitting an area code when telephone numbers are running out.